

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

Jackeline Correa

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

KeyCorp dba KeyBank National Association

*Amended*  
**COMPLAINT**

Jury Trial: ☒ Yes ☐ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

**I. Parties in this complaint:**

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	Jackeline Correa
	Street Address	768 Harrison st.
	County, City	Rahway
	State & Zip Code	New Jersey 07065
	Telephone Number	7185368606



- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1                      Name KeyCorp dba KeyBank National Association  
    Street Address 3366 Riverside drive, Suite 103  
    County, City Upper Arlington  
    State & Zip Code OH 43221

Defendant No. 2                      Name \_\_\_\_\_  
    Street Address \_\_\_\_\_  
    County, City \_\_\_\_\_  
    State & Zip Code \_\_\_\_\_

Defendant No. 3                      Name \_\_\_\_\_  
    Street Address \_\_\_\_\_  
    County, City \_\_\_\_\_  
    State & Zip Code \_\_\_\_\_

Defendant No. 4                      Name \_\_\_\_\_  
    Street Address \_\_\_\_\_  
    County, City \_\_\_\_\_  
    State & Zip Code \_\_\_\_\_

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal Questions                      ☐ Diversity of Citizenship  
☐ U.S. Government Plaintiff                      ☐ U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? 15 USC 1692 et seq., 18 U.S. Code § 514, 18 U.S. Code § 641, 18 U.S. Code § 894  
18 U.S. Code § 1028A, 18 U.S. Code § 1348, 18 U.S. Code § 1964  
15 U.S.C. 1601 et seq., 15 U.S. Code § 1640, 15 U.S. Code § 1681m



C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship \_\_\_\_\_

Defendant(s) state(s) of citizenship \_\_\_\_\_

### III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? Sansone Hyundai Inc.  
90-100 US-1, Avenel, NJ 07001

B. What date and approximate time did the events giving rise to your claim(s) occur? August 9, 2017

C. Facts: I purchased an automobile using credit or financial asset on August 9, 2017. On the installment contract, there were several terms that were contrary to public policy and federal statutes listed above in the basis for jurisdiction. To briefly detail a few, the first issue was the finance charge which is the sum of all charges but in this contract was not. On the installment contract, it was stated that the finance charge was \$4,230.63, an amount financed of \$18,602.73, total of payments of \$22,833.36 and the total sale price of \$23,833.36. The contract also failed to disclose the right to rescind and demanded a cash down payment for this credit transaction. I have been requesting debt validation including the account ledger displaying the book entry as documentary evidence of this credit transaction. I have also stated in a dispute I was not disclosed the right to rescind the transaction and in their response have stated that "no cooling off period" was provided. In this "no cooling off period" it stated, "State law does provide for a "cooling off" or cancellation period for this sale." This transaction was performed at the Sansone Hyundai Inc. dealership located at 90-100 US-1, Avenel, NJ 07001 and assigned to KeyBank National Association or Keycorp. This transaction is now also reporting on my credit profile as "charged off" and a result has been defaming my character and consumer reputation inhibiting my ability to maintain my personal and family needs.

What  
happened  
to you?

Who did  
what?

Was  
anyone  
else  
involved?

Who else  
saw what  
happened?



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**IV. Injuries:**

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. Psychological, emotional and financial injuries as a result of these  
damages.

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**V. Relief:**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

**I am seeking equitable relief to include monetary damages, punitive damages and restitution**  
**in the amount of \$75,000 for the willful false and misleading representation, unjust enrichment,**  
**willful extortion by means of fictitious obligation, unfair practices and aggravated identity theft.**

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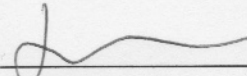
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I declare under penalty of perjury that the foregoing is true and correct.

Signed this 23 day of August, 2023.

Signature of Plaintiff



Mailing Address

768 Harrison St.

Rahway, NJ 07065

Telephone Number

7185368606

Fax Number (if you have one)

E-mail Address crazecinemainfo@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff:

